

# **EXHIBIT F**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

**DECLARATION OF CLIFFORD JENKINS**

I, Clifford Jenkins, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was employed in mutual fund trade corrections and I had worked with my company for thirteen to fourteen years prior to the attacks. I was working in downtown Manhattan at the One World Financial Center, which is the Ground Zero zone. At the time of the attacks, I was standing in front of Tower 1. I was initially stunned, shocked, and confused and I saw a number of horrific things in the aftermath of the planes hitting. I saw heads and feet severed from bodies, I saw bits and pieces of human remains and was advised by a police officer to "don't turn back." I had to walkthrough remains, and I was pelted with debris,

including glass and body parts. I inhaled copious amounts of smoke and saw people jumping to their deaths. I was severely shaken and distressed during the attacks. After that day, my life was totally changed.

4. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I was struck by debris while on the ground beside the WTC, and as a result, I endured a shoulder impingement (when a shoulder's bursa or tendons rub against the bone when moving the arm). I continue to experience pain from my shoulder as a result of this injury. I also sought medical attention for smoke inhalation – constant coughing and difficulty breathing in the months following the attacks. I also was diagnosed with a concussion as a result of being hit with debris.

5. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I have been treated by several psychiatrists for my PTSD. I have insomnia and awakening during the night. I have flashbacks to the experience, intrusive thoughts about the attacks, preoccupation of details of the events, and nightmares. I have experienced periods of dejection, dysphoria, irritability, guardness, brooding, and depression. I have gained weight since the attacks and I am chronically restless with persistent anxiety that has lasted over 18 years. I have guilt about not being able to identify remains for loved ones. The effects of my PTSD continue to this day. The actions that took place between the US and Iran with the crashing of the Ukrainian plane brought back a lot of flashbacks of September 11 and anxiety. Prior to 9-11, I had never been in any psychiatric treatment.

6. Attached as Exhibit B to this Declaration is a true and correct copy of certain of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 23 day of January, 2020.

  
Signature of Declarant, Clifford Jenkins

# **Exhibits Filed Under Seal**